

Michael J. Feigin, Esq.

FEIGIN AND FRIDMAN, LLC

1037 Route 46 East, Suite 107 • Clifton, NJ 07013

PHONE (973) 685-5280 • FAX (973) 767-1292

E-MAIL: michael@PatentLawNY.com • WEB: PatentLawNY.com

LICENSED TO PRACTICE IN NEW YORK, NEW JERSEY, AND BEFORE THE U.S. PATENT OFFICE

February 1, 2021

VIA: ECF

Hon. Pamela K. Chen, U.S.D.J.
US District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom 4F
Brooklyn, NY 11201

Cc: All Counsel via ECF

Re: MAS Wholesale Holdings LLC v. NW Rosedale, Inc., et al.
Case No.: 1:19-cv-1294-PKC

Dear Your Honor,

This office represents the defendants in the above-captioned matter.

This is in reference to plaintiff's Motion submission to the Court #44, and Your Honor's Order of January 8, 2021, and Plaintiff's submission to the Court #47, and Your Honor's order of February 1, 2021.

The defendants are in the process of submitting a response to plaintiff's motion today, February 1, 2021. Thus, please extend the deadline to oppose Plaintiff's motion to February 1, 2021, and disregard's Plaintiff's frivolous and unnecessary motion for contempt as solely designed to waste Court's resources and is not designed to elicit Defendants' compliance with the terms of the settlement agreement between the parties.

If Plaintiff's counsel were interested in Defendants' compliance with the settlement agreement terms between the parties, the counsel for the Plaintiff would have reached out to the undersigned, but he did not, which is a clear indication that Plaintiff's counsel is only interested in gaining advantage in this matter through a technicality, and is not interested in substantively resolving the matter at hand.

The undersigned had been out of the country on a business trip from January 27, 2021 and January 31, 2021 and only flew in to JFK late last night 9:00 pm on January 31, 2021, and did not get home till about 12 am late last night. The undersigned has not had a chance, due to international travel, to submit a timely opposition to the Plaintiff's motion, for which the undersigned apologizes to the Court and the adversary, but which the undersigned will submit today.

The undersigned attorney respectfully requests that the deadline to oppose the Plaintiff's motion be extended to February 1, 2021, which is merely one business day from the January 29, 2021 deadline, that the Court do NOT consider the motion unopposed, and that the Court give no weight to Plaintiff's submission #47 for contempt.

Sincerely,
Feigin and Fridman, LLC
Attorneys for Defendants

/Sergei Orel/

Sergei Orel, Esq.
Attorney at Law
sergei@patentlawny.com
Tel: 201-491-1464